

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:	)	Chapter 9
CITY OF DETROIT, MICHIGAN,	)	
	)	Case No. 13-53846
	)	
Debtor.	)	Hon. Steven W. Rhodes
	)	

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**VERIFIED STATEMENT OF CLARK HILL PLC PURSUANT TO  
RULE 2019 OF FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Clark Hill PLC ("Clark Hill") submits this verified statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, and respectfully states as follows:

1. For purposes of this Statement, the address of Clark Hill is 151 S. Old Woodward Avenue, Suite 200, Birmingham, Michigan 48009. Subject to continued investigation, and reserving all rights, Clark Hill believes it is the holder of a prepetition unsecured claim against the City of Detroit, Michigan (the "City") in the approximate amount of \$240,970.29.

2. Clark Hill currently represents the following entities (the "Clients") as creditors and/or parties-in-interest with respect to the above-captioned bankruptcy case (the "Case") of the City:

Police and Fire Retirement System of the City of Detroit (the " <u>PFRS</u> ") c/o Cynthia A. Thomas, Exec. Director 908 Coleman A. Young Municipal Center Detroit, Michigan 48226	General Retirement System of the City of Detroit (the " <u>GRS</u> ") c/o Cynthia A. Thomas, Exec. Director 908 Coleman A. Young Municipal Center Detroit, Michigan 48226
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3. Clark Hill has represented each of the Clients with respect to various matters prior to the date of commencement of the Case.

4. The claims of the Clients against the City in this Case include, but are not necessarily limited to, claims for unpaid employer contributions owed by the City. The amounts of these claims are currently subject to analysis and calculation by the Clients. Reserving all rights, the City has listed the GRS and the PFRS as the holders of general unsecured claims in the amounts of \$2,037,000,000 and \$1,437,000,000, respectively [Dkt. No. 205].

5. Clark Hill is representing each of the Clients separately and individually; the Clients have not formed and do not constitute a committee. Clark Hill has no representation agreements with the Clients, other than standard engagement agreements.

6. Neither this Statement, nor any previous or subsequent appearance, pleading, claim or suit, is intended to waive: (a) any Client's right to have final orders in non-core matters entered only after *de novo* review by a federal district court judge; (b) any Client's right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (c) any Client's right to have the reference withdrawn by the federal district court in any matter subject to mandatory or discretionary withdrawal; (d) any Client's right to object to the subject-matter jurisdiction of the Court and shall not be deemed or construed as a submission of any Client to the jurisdiction of the Court; (e) any Client's right to object to the eligibility and/or propriety of the City of Detroit, Michigan to be a debtor under chapter 9 of title 11 of the United States Code, 11 U.S.C. §101, *et seq.*, and to bring those matters in any appropriate forum; and (f) any other rights, claims, actions, defenses, setoffs, or recoupments to which any Client is or may be entitled in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved by each Client.

**Verification**

I hereby certify that, based on inquiry, the foregoing facts and statements are true and correct, to the best of my knowledge, information, and belief. Clark Hill reserves the right to revise and supplement this statement.

Respectfully submitted,

CLARK HILL PLC

/s/ Robert D. Gordon

Robert D. Gordon (P48627)

Shannon L. Deeby (P60242)

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rgordon@clarkhill.com

Dated: September 9, 2013

*Counsel to the Police and Fire Retirement System of  
the City of Detroit and the General Retirement  
System of the City of Detroit*

# EXHIBIT 1

**UNITED STATES BANKRUPTCY COURT  
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CITY OF DETROIT, MICHIGAN,	)	Case No. 13-53846
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Debtor.	)	Hon. Steven W. Rhodes
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on September 9, 2013, the Verified Statement of Clark Hill PLC Pursuant to Rule 2019 of Federal Rules of Bankruptcy Procedure was filed using the Court's CM/ECF system, which CM/ECF system will send notification of such filing to all parties of record.

CLARK HILL PLC

/s/ Robert D. Gordon

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*Counsel to the Police and Fire Retirement  
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Retirement System of the City of Detroit*